

**IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

LINDA THORNTON,)
Plaintiff,)
Vs.) CIVIL ACTION NO.: 1:07CV712-WKW
FLAVOR HOUSE PRODUCTS, INC., and)
FRANKLIN D. WILLIAMS, Jr.,)
Defendants.)

**DEFENDANT FRANKLIN D. WILLIAMS, Jr.'s
NOTICE OF MOTION FOR PROTECTIVE ORDER**

COMES NOW THE DEFENDANT, Franklin D. Williams, Jr., and hereby files his Notice of Motion for Protective Order, stating as follows:

PLEASE TAKE NOTICE that upon the Declaration/Certification of Michael Russ Goodman, Esq., and the accompanying Memorandum of Law in Support of Defendant's Motion for a Protective Order, Defendant moves this Honorable Court pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, for an Order prohibiting Plaintiff from (a) questioning Defendant, during his upcoming deposition, about the nature and specifics of his convictions in Barbour County, Alabama; and (b) disclosure or utilization of the Defendant, Franklin D. Williams', criminal record and specifically, his convictions in Barbour County, Alabama.

WHEREFORE ALL PREMISES CONSIDERED, this Defendant, Franklin D. Williams, Jr., states that a protective order should be GRANTED, limiting the scope of discovery into Mr. Williams' past criminal history and Mr. Williams' deposition testimony and subsequent trial testimony for the above-mentioned reasons.

RESPECTFULLY DONE AND SUBMITTED, this the 27th day of February, 2008.

/s/ Richard E. Crum, Esq.

Richard E. Crum, Esq.

Attorney for Defendant,
Franklin D. Williams, Jr.

OF COUNSEL
SHEALY, CRUM, & PIKE, P.C.
P.O. Box 6346
DOTHAN, ALABAMA 36302-6346
(334) 677-3000
(334) 677-0030

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the below and if not available to receive electronic transmissions, via Untied States Postal Service, postage prepaid:

Bobbie S. Crook, Esq. (bcrook100@aol.com; ald0071@aol.com)

Ann C. Robertson, Esq. (arobertson@wcqp.com; kallen@wcqp.com)

Temple D. Trueblood, Esq. (tdt@wcqp.com; kallen@wcqp.com)

Christopher W. Weller, Esq. (cww@chlaw.com; anne@chlaw.com; cheri@chlaw.com; roxie@chlaw.com)

Jennifer Swain, Esq. (jswain@bakerdonelson.com)

This the 27th day of February, 2008.

/s/ Richard E. Crum, Esq.

Of Counsel